

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

OLEN E. GIBSON

Plaintiff

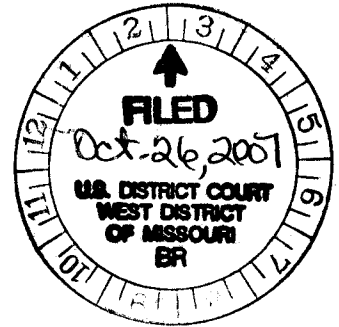
vs.

Case No. 07-0813-CV-W . REL

(1) KANSAS CITY POWER & LIGHT CO

(2) GREAT PLAINS ENERGY

(3) _____
Defendant



COMPLAINT TITLE VII

I, OLEN E. GIBSON, for my claim against the defendant(s) state and allege

as follows:

1. This action is brought and jurisdiction lies pursuant to 42 U.S.C. Section 2000e.5.

Venue is proper in this district; JACKSON

2. I am a AFRICAN-AMERICAN MALE who resides at 2200 SW PARK AVE

race

sex

street address

BLUE SPRINGS

MISSOURI

64015

city

state

zip

3. The defendant (1) KANSAS CITY POWER & LIGHT CO is an employer, employment agency,

or labor organization, as defined in 42 U.S.C. Section 2000e, and is located at _____

1201 WAINUT, KANSAS CITY, MO. 64106.

Address

4. On or about OCTOBER, 2005, defendant(s) (Specify the unlawful employment, practice which you are alleging against the defendant(s), such as: Refusal to hire, discharge from employment, harassment, RETALIATION, SEX HARASSMENT, IMPROPER CONDUCT, ENTRAPMENT, DID NOT RECEIVE SERVICE LETTER WITHIN 30 DAYS AS REQUIRED BY LAW, MISREPRESENTING DOCUMENTS, FAISIFYING DOCUMENTS, MISLEADING, MISINFORM, UNETHICAL AND UNPROFESSIONAL BEHAVIOR, WRONGFUL TERMINATION FOR FILING AN EEOC COMPLAINT because of (state why defendant[s] discriminated against you, i.e., race, color, religion, sex, or national origin, etc.)

AFRICAN-AMERICAN

5. I timely filed a written complaint of discrimination with the Equal Employment Opportunity Commission and received a right-to-sue letter, a copy of which is attached.

WHEREFORE, I pray for (state what relief is sought):

SEE ATTACHED

_____ and such other relief
as the court would allow under Title VII of the Civil Rights Act of 1964.

Olen E. Gibson
Signature

2200 SW PARK AVE
Street Address

BLUE SPRINGS, MO. 64015
City State Zip Code

816-224-1905
Telephone

WHEREFORE, Plaintiff prays for judgment as follows:

That the Court adjudge and decree, after jury trial, that Defendant has discriminated, harassed, sexually harassed, threatened, created a hostile work environment, wrongful termination, for filing a discrimination complaint with EEOC, Human Rights, and retaliated against Plaintiff because of his race, African-American, age, and for his having objected to Defendant's discriminatory treatment; As a direct and proximate result of Defendant's unlawful acts. Plaintiff has suffered economic loss in the form of lost wages, lost benefits, harm to Plaintiff's **career** advancement, lost pension and other fringe benefits. Plaintiff has also suffered non-economic losses in the form of embarrassment, humiliation, mental anguish, anxiety and inconvenience. Plaintiff seeks past and future monetary losses and damages, plus prejudgment interest in an amount in excess of \$75,000, exclusive of interest and costs. Plaintiff also is entitled to compensatory damages in the amount of \$750,000 or greater amount as the jury finds reasonable for pain and suffering, loss of enjoyment of life, humiliation, mental distress and anxiety, and inconvenience. Plaintiff also is entitled to punitive damages of \$2,000,000, or greater amount a jury finds reasonable for Defendant's willful, wanton, reckless outrageous, malicious indifference to Plaintiffs civil rights. Also;

- That the Court grant a permanent injunction enjoining Defendant, its officers, agents and employees, from engaging in any employment practice which discriminates and/or retaliates against employees, because of their race, sex and age;
- The Court enter judgment for all compensatory and punitive damages awarded by the jury;
- The Court allow Plaintiff his costs incurred herein, including all other costs and expenses;
- The Court grants such additional affirmative relief as the Court may deem just and proper.